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BY ECF

To Be Filed Under Seal

Hon. Joan M. Azrack
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: United States v. Vladimir Antonio Arevalo-Chavez
22 CR 429 (JMA)

Dear Judge Azrack:

We have received the government's April 1, 2025, letter – motion requesting dismissal of Indictment 22-429 (JMA) without prejudice pursuant to Federal Rule of Criminal Procedure 48(a). We request until April 9, 2025 to respond. Before responding I need to meet with my client to discuss the government's motion and to explore his options, if any. As he is housed in MDC SHU and only speaks Spanish, I need to meet with him with an interpreter. Visiting a client at the MDC is difficult: there are constant lockdowns preventing or delaying visitation; transport to and from SHU is always delayed because one needs an escort; and using an interpreter adds significant time to the conference.

Accordingly, we request until April 9, 2025 to respond to the government's April 1, 2025, letter. We ask that the Court not decide the government's motion until Mr. Arevalo-Chavez files his response.

Respectfully submitted,

/S/ Louis M. Freeman
Louis M. Freeman